Applicant : Udo Klein et al. Attorney's Docket No.: 15609-017001 / 2003P00621
Serial No.: 10/650.082

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## **REMARKS**

In the Action mailed May 12, 2008, the Examiner rejected all pending claims 1-8 under 35 U.S.C. §§ 112 and 103(a). In reply, Applicants have amended claim 1. Claims 9-20 have been previously withdrawn. As such, claims 1-8 remain pending. Applicants request consideration of claims 1-8 in view of the amendments and the following remarks.

While Applicants disagree with the contention in the office action that the previous amendment lacked sufficient support in the disclosure, further amendments in this regard are being made to address the Examiner's concerns, in the interest of advancing prosecution. Particularly, the phrase with the expression "common relationship" is omitted.

Claim 1 is amended to specify that a second data record has an equivalence relation to a first data record such that synchronized changes are to be made in the first data record and the second data record, but not all data records connected to central data. In particular, claim 1 is amended to state that "a second data record ... has an equivalence relation to the first data record, the equivalence relation comprising that changes in one of the first data record and the second data record are to be synchronized with the other of the first data record and the second data record" ... "but not of a record connected to the central data that is not associated with the grouping value." These amendments are supported by the present disclosure. For example, as described in the Spec. 10:14-22:

"...it should be understood that some Infotypes should be synchronized across assignments, while others should not be...the techniques synchronize Infotype records by assigning a common grouping value to specific points in time (slots), to thereby establish an equivalence relation between time slots of different timelines for the same period. As a result of this grouping technique, Infotype records may be copied, deleted, or otherwise modified such that records for equivalent (grouped) time slots contain the same data (values)."

The amendments are further supported by FIG. 3, where the payment Infotype 310 includes separate records (304, 306, and 308) that have the same relationship vis-à-vis the person 302 while maintaining an equivalence relation between similarly grouped items (Spec. 10:27-11:6). For example, the records all define wage information for the person but they relate to three different work assignments. In the illustrated example, a group is formed for the records

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306 and 308, but it does not include the record 304. The Infotypes 316, 322, and 326 are other examples of records having equivalent relationships.

No new matter is added.

## Claim Rejections – 35 U.S.C. § 112

The Examiner rejected claims 1-8 under 35 U.S.C. § 112, first paragraph and second paragraph. Without conceding that the rejection has merit, Applicants have amended claim 1 to avoid the term "common relationship". The term "equivalence relation" is described in the present disclosure (Spec. 10:14-22). Thus, Applicants submit that this addresses the issue raised by the Examiner, and ask that the Examiner remove his rejection of claims 1-8 on this basis.

## Claim Rejections – 35 U.S.C. § 103

The Examiner rejected all pending claims 1-8 under 35 U.S.C. § 103(a) as being unpatentable over USPAN 2005/0177587 (Mukundan) in view of USPN 6,112,209 (Gusack). Claim 1 is an independent claim while claims 2-8 are dependent claims. Without conceding that the rejection has merit, Applicants submit that claims 1-8 as amended are patentable over the prior art of record.

As exemplified in FIG. 3, Applicants' subject matter is directed to a method for selecting a first data record (e.g., Hospital A 304) stored at a first level of a data model, the first data record (e.g., Hospital A 304) being connected to other first-level data (e.g., Hospital B 306 and Hospital C 308) by way of central data (Person 302) stored at a second level of the data model. The disclosure discusses that some or all of the data records can be grouped.

The claims bear out aspects discussed in the above example. Claim 1 is directed to a method and includes associating the first data record (e.g., Hospital A 304) with a grouping value (e.g., Group 1) that is generated based on a predetermined grouping reason and selecting a second data record (e.g., Hospital B 306) stored at the first level that has an equivalence relation to the first data record (e.g., Hospital A 304) where the equivalence relation includes that changes in the first data record (e.g., Hospital A 304) and the second data record (e.g., Hospital

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B 306) are to be synchronized with the other of the first and second data records. The method further includes associating the second data record with the grouping value, such that a modification of the first data record will result in a synchronizing modification of the second data record (e.g., Group 2 - items 306 and 308) but not of a record connected (e.g., Group 1 - item 304) to the central data that is not associated with the grouping value.

Mukundan, in contrast, discloses a method in which a first field and a second field of a data record are displayed to a user using a client program, the second field having one or more attributes that are dependent upon the value of the first field (Abstract, 1-5). Mukundan further discloses in paragraph [0769-0770] "...a method is provided in which a change in value of a field upon which the values, format, or functionality of other fields depend will be immediately posted to the server for processing...the fields upon which the other fields depend are marked for immediate post-when-change in the repository...upon detecting that the value of a particular field has changed (this particular field is marked for immediate post-when-change), the client will immediately submit the value of this particular field and the values of other client side fields that have changed to the server for processing."

According to paragraph [0769], Mukundan posts changes to all similarly related fields (related in value, format, or functionality) upon receiving a user entered modification of one or more related fields. The Examiner contends that Mukundan provides for synchronization modification (paragraphs 0067-0068, 0078, and 0083). However, Mukundan does not provide for synchronization of data fields having an equivalence relation nor does it provide for rules to synchronize and/or not synchronize changes to equivalently related data records and/or fields. As such, Mukundan fails to disclose a method that updates some instances of a data record according to a first criteria (e.g., a first grouping value) while not updating all multiple instances of the data record based on a second criteria (e.g., a second grouping value).

Gusack discloses a linking method for an assembly of electronic-based informational items stored in and ordered by a plurality of records uniquely identified over a plurality of relational data tables. Further, Gusack discloses that a linking value can be stored in the central linking table indexes and may be predefined to automatically structure and link a plurality of

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unspecified data changes in the data and may alter the linking structure to provider further capabilities (Abstract).

However, Gusack does not provide for linking data records that have an equivalency relation (e.g., a first work schedule has an equivalency relation to a second work schedule, but not to a third work schedule, etc.). That is, Gusack does not provide for a set of changes in equivalent items (e.g., work schedules) according to one grouping criteria and another set of changes for equivalent items according to other grouping criteria, both items having the same relationship to a central data record (e.g., person).

Applicants submit that neither Mukundan nor Gusack, alone or in combination, render obvious a method for using an equivalence relation to determine if changes are to be synchronized between equivalently related data records.

The dependent claims 2-8 contain further features and are patentable over the references of record at least for the above reasons.

## Conclusion

Applicants submit that the claims 1-8 are in condition for allowance, and request favorable consideration of these claims.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

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